



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

---

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

October 1, 2020

**BY ECF**

The Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Michael Avenatti*, 19 Cr. 374 (JMF)**

Dear Judge Furman:

The Government respectfully submits this letter on behalf of the parties pursuant to the Court's Order issued on September 28, 2020 (Dkt. No. 92).

The parties request that the Court adjourn the conference presently scheduled for October 13, 2020, at 10:00 a.m., to a date and time convenient to the Court during the week beginning November 30, 2020. The parties request that the Court exclude time pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), between October 13, 2020, and the date for which the conference is rescheduled, in order to permit the defense to continue reviewing the discovery materials produced by the Government.


The parties agree that, if the conference proceeds on October 13, 2020, it should be held remotely by telephone in light of the ongoing COVID-19 pandemic. The defendant consents to doing so.

The defendant presently is on temporary release pursuant to 18 U.S.C. § 3142(i) granted by the United States District Court for the Central District of California. The parties will advise the Court in the event that the defendant's custody status changes.

Honorable Jesse M. Furman  
United States District Judge  
October 1, 2020  
Page 2

Respectfully submitted,

AUDREY STRAUSS  
Acting United States Attorney

By:   
Matthew D. Podolsky  
Robert B. Sobelman  
Assistant United States Attorneys  
(212) 637-1947/2616

cc: Robert M. Baum, Esq. (by ECF)  
Andrew J. Dalack, Esq. (by ECF)  
Tamara L. Giwa, Esq. (by ECF)